

Message

From: Echeverria, Marietta [Echeverria.Marietta@epa.gov]
Sent: 4/29/2021 3:52:44 PM
To: Herrick, Jacquelyn [Herrick.Jacquelyn@epa.gov]; Messina, Edward [Messina.Edward@epa.gov]; Goodis, Michael [Goodis.Michael@epa.gov]
CC: Saunders, Jennifer [Saunders.Jennifer@epa.gov]; Aubee, Catherine [Aubee.Catherine@epa.gov]; Rosenblatt, Daniel [Rosenblatt.Dan@epa.gov]
Subject: RE: PFAS-free Container Acceptability Letter - SS/CC unacceptable

Thanks Jackie!!!!

From: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>
Sent: Thursday, April 29, 2021 11:35 AM
To: Messina, Edward <Messina.Edward@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>
Cc: Saunders, Jennifer <Saunders.Jennifer@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Subject: RE: PFAS-free Container Acceptability Letter - SS/CC unacceptable

Will do, thank you everyone!

Jacquelyn Herrick, PM 3
Invertebrate-Vertebrate Branch 1
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(703) 347-0559
herrick.jacquelyn@epa.gov

From: Messina, Edward <Messina.Edward@epa.gov>
Sent: Thursday, April 29, 2021 11:34 AM
To: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>
Cc: Saunders, Jennifer <Saunders.Jennifer@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Subject: RE: PFAS-free Container Acceptability Letter - SS/CC unacceptable

No need. Please send as you normally would.

Thanks,
Ed

Ed Messina, Esq.
Acting Office Director
Office of Pesticide Programs
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency
Washington, D.C.
p: (703) 347-0209

From: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>
Sent: Thursday, April 29, 2021 11:11 AM
To: Goodis, Michael <Goodis.Michael@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>
Cc: Saunders, Jennifer <Saunders.Jennifer@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
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Thanks Mike. Ex. 5 Deliberative Process (DP)

Regarding the explanation to the registrant, Kerry and I have met with Clarke a few times on the issues with SS/CC and we've discussed their anticipated path forward. Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP) Clarke has also been in contact with their partners (e.g. MGK) so I'm confident the explanation currently provided in the letter should suffice.

The last letter that accepted the amendments without the SS/CC issues went up to Michal, should we wait for her approval on this one too?

Thank you again,
Jackie

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From: Goodis, Michael <Goodis.Michael@epa.gov>
Sent: Thursday, April 29, 2021 10:56 AM
To: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>
Cc: Saunders, Jennifer <Saunders.Jennifer@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>
Subject: RE: PFAS-free Container Acceptability Letter - SS/CC unacceptable

Your call. Thanks

Don't know if the company will still want to know what part of the bridging rationale was insufficient.

Michael L. Goodis, P.E.
Acting Deputy Director for Programs
Office of Pesticide Programs
Office of Chemical Safety and Pollution Prevention
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Washington, D.C.
571-309-5497 (cell)

From: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>
Sent: Thursday, April 29, 2021 9:49 AM
To: Goodis, Michael <Goodis.Michael@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>
Cc: Saunders, Jennifer <Saunders.Jennifer@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Rosenblatt,

Daniel <Rosenblatt.Dan@epa.gov>

Subject: RE: PFAS-free Container Acceptability Letter - SS/CC unacceptable

Hi all,

Although this particular product is owned by Clarke, there are other amendments that will fall into this scenario (ie amendments that will need this letter template because the SS/CC are unacceptable) where some of those products are owned by MGK. MGK will not be able to see the PC review because some of the data they are relying on is proprietary to Clarke. Ex. 5 Deliberative Process (DP)

FYI, the chemistry review only states: "The product chemistry data submitted for Anvil 2+2 ULV" (EPA Reg No 8329-61) are not sufficient in support of the container exchange program. The product-specific data of storage stability and corrosive characteristics are required to satisfy Guidelines 830.6317 and 6320. "

Going on a limb here and attached the revised letter deleting "enclosure."

Let me know.

Thanks for your help and support with this,

Jackie

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From: Goodis, Michael <Goodis.Michael@epa.gov>

Sent: Thursday, April 29, 2021 9:35 AM

To: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>

Cc: Saunders, Jennifer <Saunders.Jennifer@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>

Subject: RE: PFAS-free Container Acceptability Letter - SS/CC unacceptable

Thanks

Ex. 5 Deliberative Process (DP)

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Michael L. Goodis, P.E.
Acting Deputy Director for Programs
Office of Pesticide Programs
Office of Chemical Safety and Pollution Prevention
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From: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>

Sent: Thursday, April 29, 2021 9:28 AM

To: Goodis, Michael <Goodis.Michael@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>

Cc: Saunders, Jennifer <Saunders.Jennifer@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>

Subject: RE: PFAS-free Container Acceptability Letter - SS/CC unacceptable

Hi all,

The enclosure is the PC review which provides the chemist's determination of the bridging argument.

Ex. 5 Deliberative Process (DP)

Enclosure: 8329-61 DP461363 -62 DP461361 -82 DP461364 -106 DP461365 -108 DP461362 by Dehui-Shyam-Kerry.pdf

Note, one review was conducted for multiple products. 8329-61 was the only product with unacceptable SS/CC data. The rest were accepted with the letter that was already reviewed and approved.

Let me know.

Thanks,
Jackie

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From: Goodis, Michael <Goodis.Michael@epa.gov>

Sent: Thursday, April 29, 2021 9:09 AM

To: Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>

Cc: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>; Saunders, Jennifer <Saunders.Jennifer@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>

Subject: RE: PFAS-free Container Acceptability Letter - SS/CC unacceptable

Thanks.

What is the Enclosure? Is it the review of their bridging argument and why it is unacceptable? Should reference it in the letter.

Michael L. Goodis, P.E.
Acting Deputy Director for Programs
Office of Pesticide Programs
Office of Chemical Safety and Pollution Prevention
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571-309-5497 (cell)

From: Echeverria, Marietta <Echeverria.Marietta@epa.gov>

Sent: Thursday, April 29, 2021 8:53 AM

To: Messina, Edward <Messina.Edward@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>

Cc: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>; Saunders, Jennifer <Saunders.Jennifer@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>

Subject: FW: PFAS-free Container Acceptability Letter - SS/CC unacceptable

Importance: High

Ed/Mike – Jackie is prepared to sign this letter. Please let us know if we have the green light to sign or if you have comments or questions.

From: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>

Sent: Thursday, April 29, 2021 8:38 AM

To: Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>

Cc: Saunders, Jennifer <Saunders.Jennifer@epa.gov>

Subject: PFAS-free Container Acceptability Letter - SS/CC unacceptable

Hi RD IO,

Please see the draft acceptability letter for the new PFAS-free container where the SS/CC data are unacceptable. This letter has gone through Erin and Forrest of OGC and is ready for your review. As a reminder, Clarke is really anxious to get this letter signed and from what I gather they recently had their lawyers ping Mike.

Please let me know if you have any questions.

Thanks,
Jackie

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